

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant,
and STANLEY NELSON, individually and as joint
tenant,

Defendants.

Adv. Pro No. 10-04377 (SMB)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON,

Defendant.

Adv. Pro No. 10-04658 (SMB)

**DEFENDANTS' OBJECTION TO ADMISSIBILITY OF TRUSTEE'S EXHIBITS THAT
CONSTITUTE EXPERT REPORTS AND CRIMINAL TRIAL TESTIMONY OF FRANK
DIPASCALI**

Defendants, Carol Nelson and Stanley Nelson, respectfully submit the following:

1. Defendants object to the Trustee's exhibits, including but not limited to the expert reports and exhibits of Lisa Collura (exhibits 53-60), Matthew Greenblatt (exhibits 72-78) and Bruce Dubinsky (exhibits 34-51).
2. Defendants also object to the criminal trial testimony of all witnesses whom Defendants have not had the opportunity to depose, including Frank DiPascali, whose exhibits 355-374 are inadmissible hearsay and summaries.
3. Defendants' objections to other exhibits offered by the Trustee will be asserted at trial.

New York, New York
May 6, 2019

CHAITMAN LLP

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and Stanley Nelson*

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2019, a true and correct copy of the foregoing was served upon all parties in this action who receive electronic service through CM/ECF and via electronic mail upon:

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Dated: New York, New York
May 6, 2019

/s/ Helen Davis Chaitman